

EXHIBIT B

MOTION FOR PERMISSION TO COMMENCE LIMITED DISCOVERY

STATE OF TENNESSEE
IN THE GENERAL SESSIONS COURT OF DAVIDSON COUNTY, TENNESSEE
COURTROOM 1A

STEVEN ERICH HUBBARD,

Plaintiff,

Case No.: 21GC6958

Vs.

TRANSUNION, LLC,

Defendant.

MOTION FOR PERMISSION TO COMMENCE LIMITED DISCOVERY

NOW COMES the Plaintiff, Steven Erich Hubbard, *In Pro Per*, and pursuant to Tenn. Code. Ann. 24-9-102, hereby moves the Honorable Court for an Order allowing Interrogatories to be served upon the Defendant, Transunion, LLC. In Support of the Motion, Plaintiff avers as follows below:

1. Plaintiff, Steven Erich Hubbard, commenced the following civil action by filing a civil warrant in the General Sessions Court of Davidson County, Tennessee against Transunion, LLC. The cause of action against Transunion, LLC is for violation of the U.S. Fair Credit Reporting Act (“FCRA”), 15 U.S.C. 1681e, by failing to ensure the maximum possible accuracy of the Plaintiff’s consumer report at Transunion, LLC.

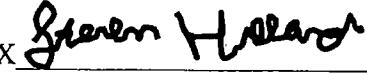
2. Defendant failed to update one of the Plaintiff’s bankruptcy cases status(s) as being either being: (1) voluntarily dismissed; or (2) closed after dismissing bankruptcy case no.: 20-11519-NWW. Accordingly, Plaintiff disputed the erroneous information from the

Plaintiff's credit report. However, Defendant verified the information, and the open bankruptcy remains in Plaintiff's credit report.

3. Plaintiff requests the Honorable Court to allow the Plaintiff to serve upon Defendant 10 (ten) written interrogatories. These interrogatories will allow the Plaintiff to determine various aspects of the Defendant's liability, procedures in handling the Plaintiff's credit dispute, and determination of damages based upon the evidence to be uncovered under the written interrogatories.
4. Plaintiff avers the requirements of Tenn. Code. Ann. 24-9-102(1) have been met in the case. Both good cause and exceptional circumstances require the usage of discovery under Tennessee Rules of Civil Procedure 26-37. Plaintiff requests a narrow scope of discovery, namely written interrogatories, to be served upon Defendant. This narrow discovery will allow the Honorable Court at trial to better understand the Plaintiff's case and causation, liability, and resulting damages from the Defendant's misconduct as reveled in the discovery.

WHEREFORE, Plaintiff, Steven Erich Hubbard, *In Pro Per*, prays that the Honorable Court allow the Plaintiff to enter a discovery order, as required by Tenn. Code. Ann. 24-9-102, in the amount of 10 (ten) written interrogatories to Defendant and be required to answer as required by the rules of civil procedure.

Respectfully Submitted,

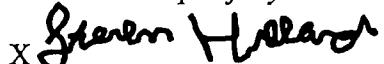
X 

Steven Erich Hubbard
478 North Chancery Street
McMinnville, TN 37110
Tel: (931) 570-0784
E-mail: StevenHubbardTN@gmail.com

Certificate of Service

On Thursday, June 3rd, 2021, Steven Erich Hubbard ("Mr. Hubbard"), hereby certifies, *under penalty of perjury*, I mailed a copy of the Motion for Permission to Commence Limited Discovery on the Defendant, Transunion, LLC at the address listed below:

Transunion, LLC
ATTN: The Prentence-Hall Corporation System, Inc.
2908 Poston Avenue
Nashville, TN 37203

Respectfully Submitted,
X 

Steven Erich Hubbard
478 North Chancery Street
McMinnville, TN 37110
Tel: (931) 570-0784
E-mail: StevenHubbardTN@gmail.com